PROPOSED PLAN OF REMEDIAL ACTION

ONE RIVER PLACE HEADQUARTERS SITE
Wilmington, Delaware

DE-1309

September 2004

Department of Natural Resources and Environmental Control
Division of Air and Waste Management
Site Investigation and Restoration Branch

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1.0 Introduction

The One River Place Headquarters (site) is approximately 2.4 acres in size and is located at One River Place on two City of Wilmington tax parcels (Tax Parcel #26-042.00-027 and Tax Parcel #26-042.00-007). Tax Parcel #26-042.00-027 was created from a portion of the current City of Wilmington (City) Public Works Yard (Tax Parcel # 26-042.00-006) and Tax Parcel #26-042.00-007 which was owned by the former Bell's Supply south of West Street in Wilmington, New Castle County, Delaware (Figure 1 and Figure 2). In order to evaluate the environmental conditions prior to the development of the site, the Riverfront Development Corporation (RDC) and the City entered into the Department of Natural Resources and Environmental Control, Site Investigation and Restoration Branch's (DNREC-SIRB's) Voluntary Cleanup Program (VCP) under the provisions of the Delaware Hazardous Substance Cleanup Act (HSCA), 7 Del. C. Chapter 91. Through a VCP Agreement, RDC and the City agreed to investigate the potential risks posed to public health, welfare and the environment at the site. RDC and the City contracted with BrightFields, Inc. to perform a remedial investigation (RI), interim response actions (IRAs), and a feasibility study (FS) of the site pursuant to HSCA.

The objectives and the accomplishments of this environmental work were as follows:

- Document existing environmental conditions at the site. This was accomplished by collecting soil and groundwater samples to investigate the impact that historic uses of the property and the surrounding lands may have had on the property. Existing data collected during previous investigations, including soil, sediment, and groundwater samples were used to supplement the data collected.
- Identify source(s) of contaminants, if present.
- Prepare a statement of relative risk, based on the RI data, describing the impact of any environmental contaminants present given the potential use of the site.
- Evaluate whether remedial action(s) may be required at the site, and if they are, how they can be integrated with the site redevelopment and construction plan.
- Complete interim response actions as approved by DNREC.

This document is the Department's proposed plan of remedial action (proposed plan) which contains the Department's chosen remedial alternative for the site.

2.0 Organization and Contents of the Proposed Plan

DNREC issues this proposed plan under the provisions of HSCA and the Regulations Governing Hazardous Substance Cleanup (Regulations). The proposed plan presents

DNREC's assessment of the health and environmental risks posed by the site and the selection of remedial action to mitigate these risks.

In accordance with HSCA, DNREC hereby provides notice to the public and an opportunity for the public to comment on the proposed plan. At the comment period's conclusion, DNREC will review and consider all of the comments received and then DNREC will issue a final plan of remedial action (final plan). The final plan will designate the selected remedy for the site. All prior investigations of the site, as well as references to IRAs and other investigations included in the RI report, the proposed plan, and the comments received from the public, DNREC's responses to those comments, and the final plan will constitute the remedial decision record.

DNREC's proposed remedy is preliminary and a final decision will not be made until all of the comments are considered. The final remedy selected could differ from the proposed remedy based on DNREC's response to comments.

The proposed plan contains a description of the following site information:

- A summary of the procedures, analytical results, interim response actions and conclusions of the Remedial Investigation,
- A discussion of objectives,
- A summary of the risk assessment results, and
- A plan for the site's future use and maintenance.

3.0 Site Description

The One River Place Headquarters site is located adjacent to the Christina River in Wilmington, Delaware (Figure 1). The property is bordered by West Street to the north, the Wilmington Public Works Yard to the south and west, and Juniper Bank (formerly O'Brien Energy) and the Christina River to the east (Figure 2).

At the time when the RI was initiated, the site consisted of approximately 3.01 acres. As the project moved toward completion, the site boundaries were modified to be comprised of two (2) parcels consisting of approximately 2.4 acres. The two (2) parcels include: 0.88 acres of the former Bell's Supply parcel located at 301 South West Street (Tax Parcel ID# 26-042.00-007) and 1.56 acres acquired from the City of Wilmington Public Works Yard parcel located at 601 South West Street (new Tax Parcel ID# 26-042.00-027). The two (2) parcels were subdivided from existing parcels and recorded in July 2004. The 0.57 acre parcel (Tax Parcel ID# 26-042.00-028) located adjacent to Juniper Bank was part of the site when the project was initiated, and has been included as part of the site investigations, but is not part of the Riverfront Headquarters site for the purposes of this proposed plan. The parcel locations are shown on Figures 2, 3, and 4.

Based on the data collected during the RI and during geotechnical borings, the stratigraphy of the site can be divided into four basic units (surface to depth) as follows:

- Fill containing slag, brick, wood and sand with minor amounts of trash
- Marsh Deposits (Holocene)
- Columbia Formation (Pleistocene)
- Bedrock

The fill layer is primarily composed of silt and clay with some sand, gravel, and debris such as brick, slag, glass, and wood and minor amounts of waste. The fill ranges in thickness from 7 to 13 feet and overlies the native marsh deposits.

The Holocene-aged marsh deposits are gray, black, or brown stiff clay and silt containing organic vegetation, which are approximately 11 to 21 feet thick, and are underlain by the Pleistocene Columbia Formation.

The top of weathered bedrock was encountered at 42 to 48 feet below ground surface (bgs) at an elevation of 36 to 38 feet below mean sea level (msl). Competent (unweathered) bedrock was encountered at a depth of approximately 79 to 84 feet bgs (an elevation of approximately 73 to 78 feet below msl).

Groundwater was encountered at depths ranging from 4 to 9.5 feet bgs in the borings completed across the site. Seasonal groundwater fluctuation was reported to be between several inches and two feet on the adjacent (upgradient) Berger Brothers property (DE-0131), depending on rainfall (Tetra Tech, 2003).

Groundwater beneath the site is expected to flow from northwest to southeast toward the Christina River. Calculations of the horizontal gradient for the site (based on measurements collected on February 7 and March 23, 2004) showed that the gradient was fairly consistent and ranged from 0.093 to 0.011 ft/ft across the site.

The site is relatively flat and is situated on a bend of the Christina River. Preconstruction ground surface elevations ranged from approximately 10 ft to 15 ft above msl. Final site grades will be provided after construction completion. Surface water drainage discharges through two (2) routes as follows: it is either routed through stormwater catch basins and conveyances to a combined sewer outfall (CSO) located on the adjacent Public Works Yard, and then to the Christina River, or it is captured by the bioswale and slowly infiltrates and discharges to the Christina River.

The nearest designated New Castle County Water Resource Protection Area (WRPA), including wellheads or groundwater protection areas, is greater than three (3) miles from the site. The nearest surface water supply intake is greater than two (2) miles from the site and the site is not within a Critical Water Resource Area. The site is located within the Wilmington Groundwater Management Zone (GMZ), which was established by DNREC in August 2001 to prevent the installation of water supply wells in this area.

4.0 Site History

The site is located in an area of Wilmington that has been in continuous industrial use since the late 1700s. Detailed historical information on the area can be found in the following reports:

- Final Remedial Investigation Work Plan Wilmington Public Works Yard, Wilmington, Delaware (WIK, February 2001)
- O'Brien Property Brownfield Preliminary Assessment II Wilmington, Delaware (DNREC, September 1998)

The following investigation reports and information were reviewed, and detailed summaries of the investigations are included in the March 2004 Riverfront Headquarters Property Remedial Investigation report:

- Wilmington Public Works Yard DNREC BPA II – DNREC, 1997
- O'Brien Property BPA II – DNREC, 1998
- West Street Connector Transportation Improvements – WIK, 1998/99, including the West Street Connector RI, WIK 1998, the Bell's Supply Interim Technical Report (WIK, 1998) and the Additional DNREC Sampling Report (WIK, 1999)
- Christina River Pedestrian Walkway (Phases III & IV) RI/FS – EA, 1999
- Wilmington Public Works Yard Remedial Investigation – WIK, 2001
- Berger Brothers/Gates Engineering Background Information and the Berger Brothers/Gates Engineering Revised RI/ FS/ RAWP – Tetra Tech, 2003

The following additional reports were used in the preparation of the proposed plan:

- Riverfront Headquarters Property Focused Feasibility Study- Brightfields, 2004
- Wilmington Public Works Yard OU-1 [Summary Report for PCB Characterization in the Vicinity of RHQ-1- Brightfields, 2004]
- Contaminated Material and Water Management Work Plan
- Supplemental Risk Calculation (Deborah Heffernan, dated September 8, 2004, using the EPA April 2004 Risk-based Concentration (RBC) Table)

5.0 Remedial Investigation Results

The following summary of findings was prepared based on the data collected during the RI and during previous investigations at the site:

General:

- The site comprises an area of approximately 2.4 acres located along the Christina River in Wilmington, Delaware and prior to the initiation of interim actions was a parking lot and a portion of the City of Wilmington Public Works Yard. The proposed future site use is a six-story commercial office building, with parking lots and landscaped areas.

Soil:

- Boring, test pit, and well drilling logs indicate that portions of the site are filled with industrial fill (up to 13 feet thick) and underlain by marsh deposits.

- Twenty-two (22) soil samples were analyzed at Lancaster Laboratories for confirmatory analysis for Target Compound List volatile organic compounds (TCL VOCs), TCL semivolatile organic compounds (TCL SVOCs), TCL pesticides/poly-chlorinated biphenyls (PCBs), and Target Analyte List (TAL) metals and cyanide. Data from eight (8) existing samples was also used to evaluate site contaminants of concern. The results are summarized in Tables 1 through 4.

- Aluminum, arsenic, antimony, iron, lead, manganese, nickel, vanadium, PCBs, pesticides, and polynuclear aromatic hydrocarbons (PAHs) were detected in site soil above the Delaware Uniform Risk-Based Remediation Standards (URS) values for unrestricted use and are potential contaminants of concern based on these exceedances.

- Arsenic, iron, lead, benzo(a)pyrene, and PCBs were detected in site soil above the restricted use (commercial) URS and were considered potential site contaminants of concern for the risk calculations. The cumulative risk calculations indicate that exposure to the site soil poses an unacceptable carcinogenic and non-carcinogenic risk under the unrestricted use scenario, but not under a restricted use scenario.

- An area with elevated subsurface soil lead concentration was identified on the eastern portion of the site at a minimum of approximately 3 feet below pre-construction ground surface. Figure 3 shows the areas of elevated lead concentrations. Surface soil lead concentrations ranged from 21 to 250 mg/kg, which is below both unrestricted (residential) and restricted (commercial) use standards.

Groundwater:

- Four (4) new monitoring wells were installed and four (4) groundwater samples

were collected and analyzed for TCL VOCs, TCL SVOCs, TCL pesticides/PCBs, and TAL metals and cyanide.

- Based on groundwater elevations measured in the wells, the groundwater flow direction is toward the southeast (toward the Christina River).

- Iron, barium, manganese and PCB Aroclor-1260 were detected in site groundwater above the URS groundwater value. The HSCA URS for iron and manganese in groundwater are based on the EPA Secondary Drinking Water Regulations (SDWRs) which are aesthetic criteria rather than risk-based concentrations. In addition, the iron and manganese results were in the background range. Therefore, iron and manganese were not considered potential contaminants of concern. As a result, for the purpose of assessing risk to human health, only barium and PCB Aroclor-1260 were determined to be potential site contaminants of concern in the groundwater. The groundwater results are summarized in Tables 5 and 6.

- Routinely ingesting groundwater from the site poses an unacceptable carcinogenic and non-carcinogenic risk. However, the property is located in the pre-existing City of Wilmington GMZ, dated August 2001, where the use of groundwater is controlled by DNREC. No new public or domestic water supply wells are allowed or permitted in the area and all existing water supply wells are located further than two (2) miles from the site. However, no complete pathway for groundwater ingestion exists, nor will it exist. Therefore, the site groundwater does not pose a risk to human health under current and restricted (i.e., commercial) future use scenarios.

- The mass loading calculations were performed based on the February 2004 groundwater results. The mass loading calculations indicated that PCBs in site groundwater may be a potential source of PCB contamination to the Christina River. However, the PCB detection used in the mass loading calculation was from RHQ-1 and the monitoring well between RHQ-1 and the Christina River reported non-detect for PCBs. Further, any potential PCB exceedence is likely related to offsite contamination. Therefore, because transformers were previously staged at the Public Works Yard, the PCB contamination in soil and groundwater will be addressed in Operable Unit 1 of the Public Works Yard through a separate pre-existing Voluntary Cleanup Program agreement.

- During the February 2004 RI sampling investigation, PCBs were detected in one monitoring well, RHQ-1. The detection was above the URS groundwater value for PCBs. BrightFields conducted a supplemental PCB investigation in August 2004, including resampling the groundwater at monitoring well RHQ-1 and collecting both a filtered and an unfiltered sample. The unfiltered PCB sample reported 0.94 ug/L (which is one order of magnitude below the original detection), and the filtered sample reported non-detect. As stated above, any potential PCB

exceedence is likely related to offsite contamination. Therefore, because transformers were previously staged at the Public Works Yard, the PCB contamination in soil and groundwater will be addressed in Operable Unit 1 of the Public Works Yard through a separate pre-existing Voluntary Cleanup Program agreement.

Sediment:

- The site boundary is located a minimum of one hundred (100) feet west of the Christina River bank and west of the Christina River Pedestrian Walkway property (Riverwalk). During previously completed HSCA investigations, twenty-one (21) sediment samples were collected from the bank of the Christina River and six (6) river sediment samples were collected from the edge of the river below the waterline. The previous results indicate that the sediment has been sufficiently characterized during previous investigations. The area was impacted by metals and PAHs. The remedial action remedy for the Riverwalk Site (DE-1139) included sediment removal, slope stabilization and construction of the Riverwalk. These activities were performed between the site and the Christina River in accordance with the DNREC Final Plan of Remedial Action for the Christina River Pedestrian Walkway (August 1999). This remedial action adequately dealt with any contribution to contaminants in sediments from the site.

- The One Riverplace Headquarters site has a DNREC-approved Erosion and Sediment Control Plan (E&S Plan). As part of the E&S Plan, concrete barriers were placed around the AAA site. The barriers were wrapped in plastic, and weighted with gravel at the base of the barriers to prevent any surface water run-off from the Riverfront Headquarters site to the Christina River. All stormwater was contained on-site or filtered through an on-site sedimentation tank with filters prior to being discharged into the sanitary sewer in accordance with City of Wilmington permit requirements.

6.0 Interim Response Actions

The Interim Response Actions (IRA) at the site were initiated in order to properly manage, handle and dispose of soil and groundwater and other materials generated at the site and encountered during construction. These IRAs were performed at the site prior to issuance of the proposed plan and will continue until construction completion.

Interim Response Actions occurred during the following construction activities: rerouting two (2) large existing storm water lines, installing underground utilities, pre-augering for foundation piles, and excavations for pile caps, grade beams and an elevator shaft. IRA will continue to occur throughout construction as needed for construction completion. IRA completed after the August 2004 Interim Response Action Status Report will be

summarized in the HSCA Construction Completion Report for this project, which will be prepared after substantial construction completion.

The following DNREC-approved remedial IRA were performed at the site with DNREC oversight and in accordance with the DNREC-approved Contaminated Material and Water Management Work Plan (CMWMWP) and Health and Safety Plan (HASP):

- **Dewatering**: When groundwater was pumped from excavations, it was pumped to a settlement tank, and then filtered to remove sediment prior to discharge into the City's sanitary sewer system under a temporary discharge permit granted by the City of Wilmington. Flow metering and discharge sampling were performed as required by the City. Analytical results of the discharge samples met the City's permit requirements. Approximately 712,000 gallons of groundwater were pumped from the site, filtered, and discharged to the sanitary sewer system.

- **Disposal of Site Dewatering Sediment**: The sediment collected during dewatering was removed from the settlement tank, managed and properly disposed off-site along with the lead-hazardous soil (see below). The sediment was properly disposed of by Casie Ecology Oil Salvage, Inc. in Vineland, New Jersey.

- **Disposal of Lead-hazardous Soil**: Subsurface soil excavated for construction purposes that was determined to be hazardous waste based on lead resultsconcentration using the Toxicity Characteristic Leaching Procedure (TCLP) analysis was removed and properly disposed offsite per federal and state regulations. Approximately 1,800 tons of lead-hazardous soil were removed and properly disposed during this IRA. The soil was properly disposed of by Casie Ecology Oil Salvage, Inc. in Vineland, New Jersey.

- **Disposal of Non-hazardous Soil**: Excavated soil that was non-hazardous, and that could not be reused on site for structural reasons, was removed and properly disposed, per federal and state regulations. Approximately 2,600 tons of non-hazardous soil was removed as part of this IRA. The soil was properly disposed at the Soil Safe, Inc. facility in Bridgeport, New Jersey.

- **Re-use of Non-hazardous Soil**: Excavated soil that was non-hazardous and could be reused on site was reused. Approximately 150 to 300 tons of soil were re-used as on site fill.

- **Disposal of Lead-hazardous Wood**: Excavated wood that was hazardous for lead per TCLP analysis was removed, cut into three (3) foot sections, loaded into a roll-off and properly disposed of in accordance with federal and state regulations. Approximately seven (7) tons of lead-hazardous wood were

removed as part of this interim action. The wood was properly disposed at Envirosafe Services of Ohio Inc. in Oregon, Ohio.

- **Disposal of Non-hazardous Wood**: Excavated wood that was non-hazardous was removed, cut into three (3) foot sections, loaded into a roll-off and properly disposed. Approximately 16.5 tons of non-hazardous wood was removed during this IRA. The wood was properly disposed at Modern Landfill in York, Pennsylvania.

- **Marker Fabric**: Orange marker fabric was placed along the side walls and floors of the utility trenches to delineate the clean fill from the historic industrial fill. As noted above, subsurface soil on the eastern side of the site is hazardous for lead. Tested and DNREC-approved clean fill was used as backfill in the utility trenches. Therefore, as the trenches now contain clean fill, DNREC will not have to be contacted for utility upgrade or repair unless the work is conducted outside the clean fill areas.

- **Erosion and Sediment Controls**: In addition to standard sediment and erosion control measures, DNREC-required concrete barriers were installed around the site perimeter to prevent offsite sediment migration.

7.0 Remedial Action Objectives

The Regulations provide that DNREC set objectives for land use, resource use, and cleanup levels that are protective of human health and the environment. The following qualitative objectives are determined to be appropriate for the site:

- Control potential human exposure (dermal, inhalation and ingestion) to contaminated soil.

- Control potential contaminated soil erosion and subsequent overland transport of contaminated surface water to the Christina River.

- Properly reuse or dispose of all excavated soil and groundwater generated during construction, in accordance with local, state and federal regulations.

These objectives are consistent with the planned development of the site and the surrounding land and development plans for the City of Wilmington, zoning policies, state regulations governing water supply, and worker health and safety.

Based on the above qualitative remedial action objectives, the following quantitative remedial action objectives (RAO) based on restricted use were developed:

- Prevent human exposure to soil or other media having a cumulative risk factor greater than 1 x 10^{-5} and/or a hazard index of 1, or as based on DNREC URS tables. This includes but is not limited to the following:

    1. Prevent human exposure to soil having a lead concentration greater than the URS for lead of 1,000 milligrams per kilogram (mg/kg).

    2. Prevent human exposure to soil having an arsenic concentration greater than 19 mg/kg, per the EPA RBC for arsenic (April 2004).

    3. Prevent human exposure to soil having a benzo(a)pyrene concentration greater than 0.8 mg/kg, the site-specific risk-based concentration.

    4. Prevent human exposure to soil having a PCB concentration greater than 25 mg/kg developed, per the Toxic Substances Control Act (TSCA) low occupancy area risk-based cleanup levels.

- Dispose offsite at a licensed Resource Conservation and Recovery Act (RCRA) hazardous waste disposal facility all excavated soil generated during construction with lead Toxicity Characteristic Leaching Procedure (TCLP) results above 5.0 milligrams per liter (mg/L).

- Manage and mitigate environmental risks, as they occur during the building construction and redevelopment process, in accordance with the DNREC-approved, site-specific CMWMWP and the site-specific Health and Safety Plan (HASP). This will include, but is not limited to, removal of underground storage tanks (USTs) and petroleum-impacted soil, if discovered, in accordance with DNREC's Tank Management Branch (TMB) regulations.

8.0 Risk Evaluation Summary

A risk assessment to evaluate the possible effects on human health from the use of the site consistent with the objectives discussed above was performed using appropriate risk assessment methods.

The carcinogenic cumulative risk posed by site soil to a commercial worker would be 9.0 x 10^{-6} (9.0 in 1,000,000), which is within DNREC acceptable risk guidelines. The individual compounds that most significantly contribute to the carcinogenic risk are arsenic and benzo(a)pyrene. The non-carcinogenic cumulative risk would result in a Hazard Quotient of 0.04, which is within DNREC's acceptable risk guidelines.

Under a construction worker scenario the carcinogenic risk posed by site soil was calculated to be 1.4 x 10^{-6} and the non-carcinogenic hazard index was calculated to be 0.14 which again are within acceptable risk guidelines.

Because the US EPA has not published a consensus chronic reference dose (RfD) or cancer slope factor (CSF) for inorganic lead, it is not possible to calculate risk-based concentrations for this metal and, therefore, it is not included in the DNREC Risk Calculator. The US EPA Office of Solid Waste directive recommends that soil levels less than 1,000 mg/kg (which is the same concentration used by DNREC for the restricted use criteria) are generally safe for commercial use. The mean lead concentration across the site is 508 mg/kg, which is below the restricted use evaluation criteria. However, disposal characterization samples from the geotechnical borings contained up to 14.1 mg/L in TCLP lead analysis, indicating that leaching is possible under low pH conditions. Nevertheless, based on the groundwater data at the site, lead is not leaching under field conditions of pH 7 to 8. The distribution of lead at the site is presented in Figure 3.

Because the elevated lead concentrations were predominantly located in the subsurface samples from the eastern portion of the property, separate calculations were performed to evaluate the lead distribution. The 95% Upper Confidence Limit (UCL) of the mean for the subsurface samples on the eastern portion of the property is 2,596 mg/kg, which is above both unrestricted and restricted use criteria, poses a risk if direct contact occurs. However, this soil is below the ground surface and will not be accessible by direct contact. The building footprint and/or parking areas will cover this area, as well as the majority of the site. The 95% UCL of the mean for the surface and surface samples collected from the remainder of the property is 359 mg/kg, which is below both unrestricted and restricted use criteria.

The lead-impacted subsurface soil is located along the eastern edge of the site. This subsurface soil was located at a minimum depth of three (3) feet below the top of ground across the eastern portion of the site prior to construction. The site will be filled for construction purposes. At the completion of construction, all areas of lead-impacted soil above commercial levels will be covered with a minimum of two (2) feet of clean fill. As such, there is no direct exposure pathway to the soil. Based on the risk assessment results and DNREC's requirements for protection of human health and the environment, the site does not require either the removal of the lead-impacted soil or the placement of an impervious cap. However, after construction completion, the surface of the soil will be covered with imported fill, the building, parking lots, hardscaping and/or landscaping.

The cumulative risk assessment performed for site groundwater shows that consumption of groundwater from beneath the site would pose an unacceptable carcinogenic and non-carcinogenic risk. However, the site is included in the existing City of Wilmington Groundwater Management Zone as well as regulated by City of Wilmington municipal law all of which prevent potable consumption of groundwater within the City limits.

The risk to the environment resulting from groundwater discharge to surface water was also evaluated. Based on modeling of the chemicals of concern in groundwater, total PCBs are below the URS and the fresh water chronic criteria, but exceed the fish ingestion criteria. All other parameters detected in site groundwater, are more than one order of magnitude lower than the most conservative surface water quality criteria by the time they reach the Christina River.

9.0 Proposed Plan of Remedial Action

Based on the results of previous investigations, including the RI, the FFS, the IRA at the site and the RAOs, DNREC proposes the following remedial actions for the site:

- As described in Alternative 3 in the FFS, the proposed remedy for soil contaminated with lead consists of the proper management and offsite disposal of excavated, lead-contaminated soil with TCLP analysis results above 5 mg/l. This will be performed each time soil is excavated during the building construction and utility installation process. All work has been and will continue to be performed under the CMWMWP and the HASP. To date, several interim action soil removal actions have been performed on the site and will continue to be performed through the remaining construction phases of the project. The remaining construction activities include but are not limited to installing the building slab and additional utilities work as necessary to support the operation of the building, as shown on the Site Development Plan (Figure 4).
- Following construction completion, any intrusive activities (including excavating, etc.) in the soil below two (2) feet in depth in the lead-impacted areas of the site will be restricted by the placement of a deed restriction noting that no intrusive activities will be allowed without prior approval of DNREC.
- The DNREC-approved O&M Plan will be finalized within 90 days following construction completion. The O&M Plan will provide procedures for evaluating the integrity of the site stabilization following construction. In addition, the O&M Plan will include a Groundwater Quality Management Plan for the site which will include provisions for continued groundwater monitoring and evaluation.
- The groundwater will be restricted by the owner by the placement of a deed restriction noting that groundwater shall not be used as a potable water supply and the site is located within a City of Wilmington GMZ (dated August 2001) to prevent future use of the groundwater beneath the site without prior approval of DNREC. In addition, the City prohibits drinking water wells to be installed within the City limits as follows:

  > "The use, maintenance, possession and construction of a private well within the boundaries of the city without the approval of the commissioner, who may in his discretion grant such approval, is

prohibited. Every person violating this section shall be guilty of a misdemeanor and shall be punished by a fine of $100.00."

- While not anticipated based on historical uses of the site, any petroleum contaminated materials or underground storage tanks (USTs) that are encountered during construction at the site will be addressed by DNREC's Tank Management Branch (TMB) according to the applicable TMB regulations.
- The site use will be restricted to commercial use by the owner by the placement of a deed restriction. Any future development of the parcels will be limited to commercial development.

10.0 Public Participation

DNREC-SIRB actively solicits public comments or suggestions on the proposed plan and welcomes opportunities to answer questions. Please direct written comments to:

Department of Natural Resources and Environmental Control
Division of Air and Waste Management
Site Investigation and Restoration Branch
391 Lukens Drive
New Castle, Delaware 19720-2774
Attn: Jane Biggs Sanger

For verbal comments, please call Jane Biggs Sanger at (302) 395-2600. The public comment period for this proposed plan begins on September 13, 2004, and ends at the close of business (4:30 p.m.) on October 4, 2004. If requested, a public hearing will be held on the proposed plan. The hearing time and place will be announced if said hearing is requested.

John Blevins, Director
Division of Air and Waste Management

9/10/04
Date of Review of Proposed Plan

JFBS/rm/JFB03071.DOC
Revised:slb/DE 1289 II B8

FIGURE 1
Site Location/Topographic Map

From USGS Wilmington South Quadrangle
Wilmington Del. - N.J.
7.5 minute series, 1993

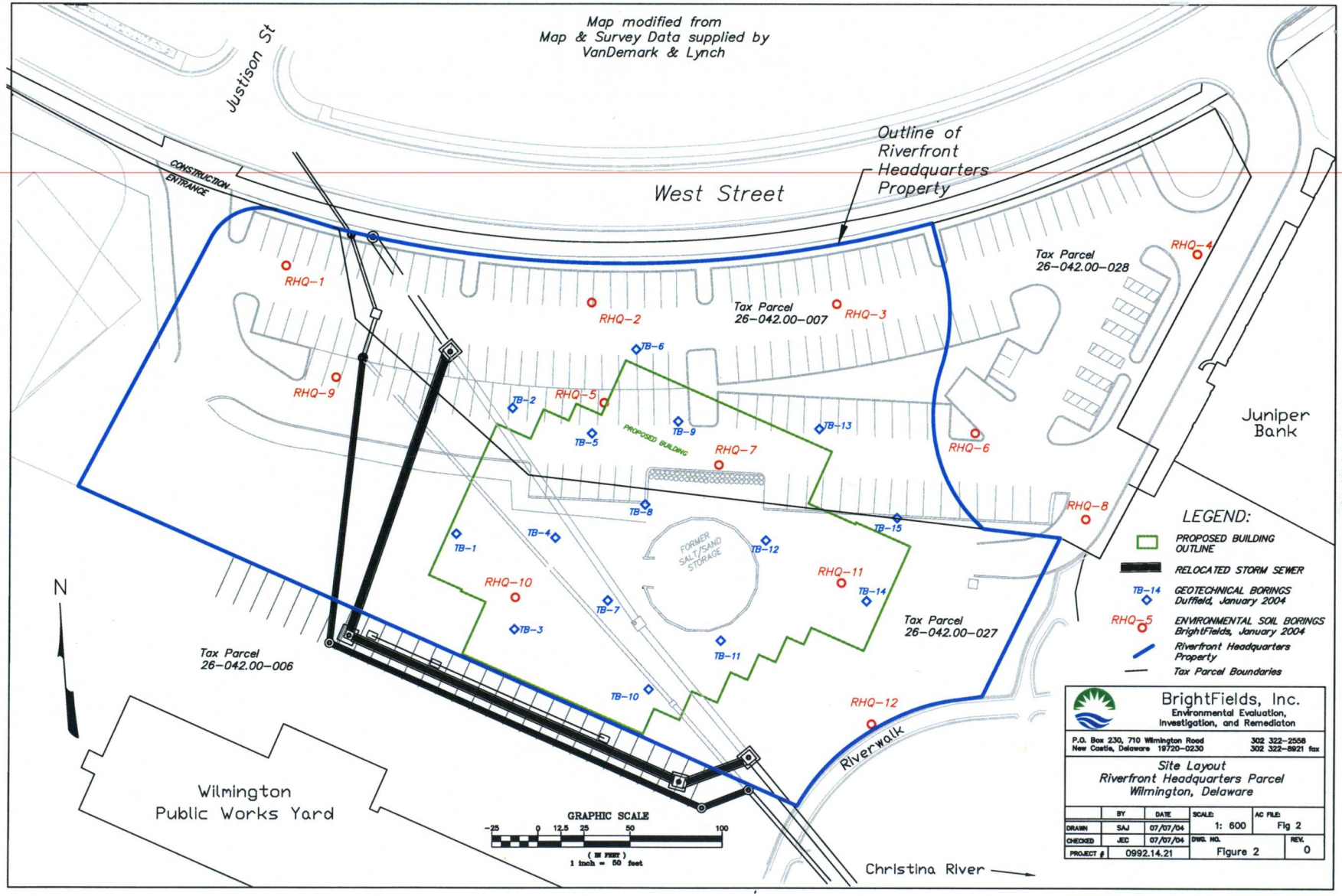
Riverfront Headquarters Project
Wilmington, Delaware

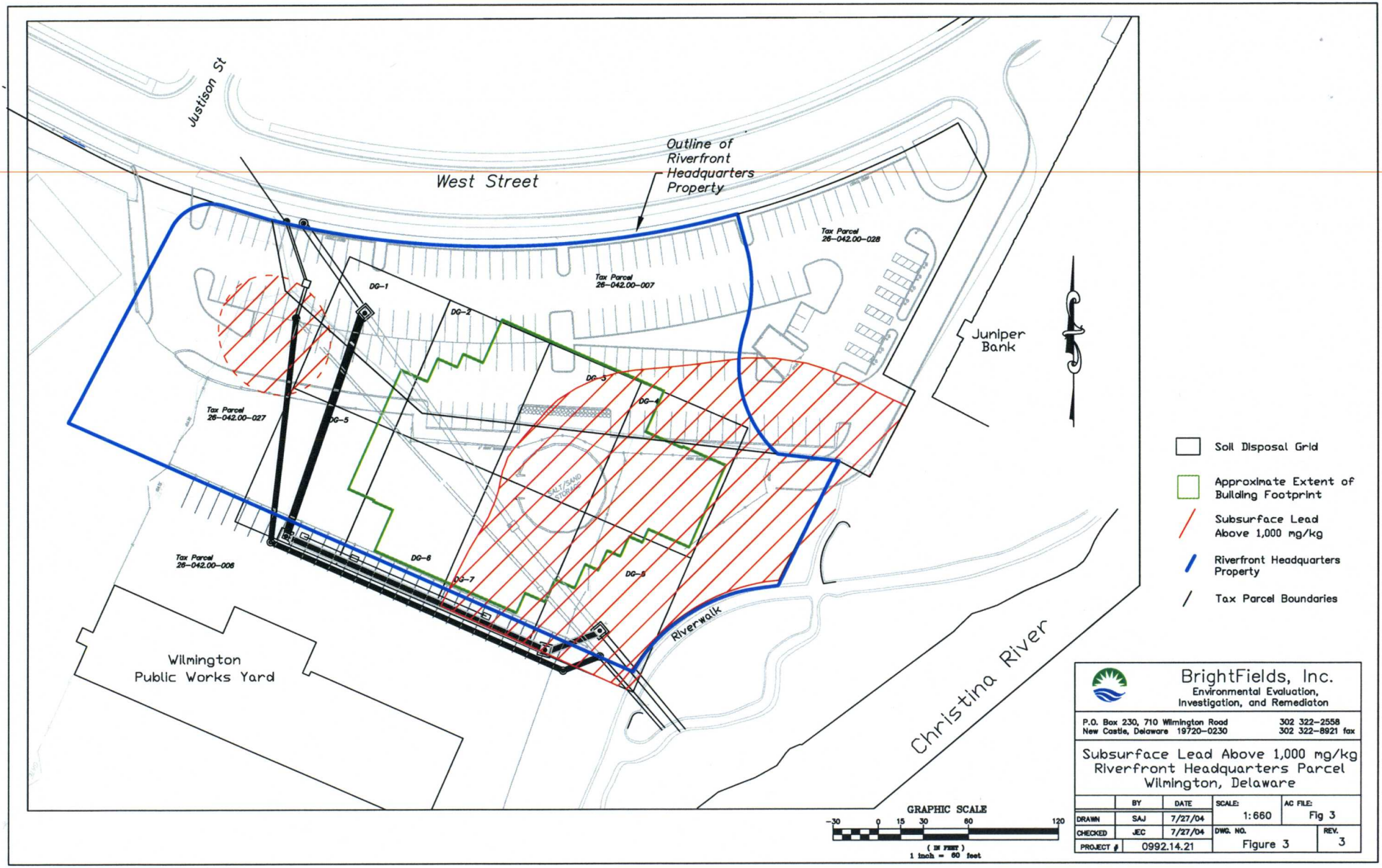
File No. 0992.14.21

N

0 2,000

SCALE (feet)


Map modified from
Map & Survey Data supplied by
VanDemark & Lynch
Justison St
West Street
CONSTRUCTION ENTRANCE
Outline of Riverfront Headquarters Property
Tax Parcel 26-042.00-028
Tax Parcel 26-042.00-007
Tax Parcel 26-042.00-027
Tax Parcel 26-042.00-006
Juniper Bank
Wilmington Public Works Yard
Riverwalk
Christina River
PROPOSED BUILDING
FORMER SALT/SAND STORAGE
RHQ-1
RHQ-2
RHQ-3
RHQ-4
RHQ-5
RHQ-6
RHQ-7
RHQ-8
RHQ-9
RHQ-10
RHQ-11
RHQ-12
TB-1
TB-2
TB-3
TB-4
TB-5
TB-6
TB-7
TB-8
TB-9
TB-10
TB-11
TB-12
TB-13
TB-14
TB-15
N
GRAPHIC SCALE
-25 0 12.5 25 50 100
(IN FEET)
1 inch = 50 feet
LEGEND:
PROPOSED BUILDING OUTLINE
RELOCATED STORM SEWER
TB-14 GEOTECHNICAL BORINGS Duffield, January 2004
RHQ-5 ENVIRONMENTAL SOIL BORINGS BrightFields, January 2004
Riverfront Headquarters Property
Tax Parcel Boundaries
BrightFields, Inc.
Environmental Evaluation, Investigation, and Remediation
P.O. Box 230, 710 Wilmington Road New Castle, Delaware 19720-0230
302 322-2558
302 322-8921 fax
Site Layout
Riverfront Headquarters Parcel
Wilmington, Delaware
BY DATE SCALE: AC FILE:
DRAWN SAJ 07/07/04 1: 600 Fig 2
CHECKED JEC 07/07/04 DWG. NO. REV.
PROJECT # 0992.14.21 Figure 2 0



BrightFields, Inc.
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P.O. Box 230, 710 Wilmington Road
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302 322-2558
302 322-8921 fax

Subsurface Lead Above 1,000 mg/kg
Riverfront Headquarters Parcel
Wilmington, Delaware

	BY	DATE	SCALE:	AC FILE:
DRAWN	SAJ	7/27/04	1:660	Fig 3
CHECKED	JEC	7/27/04	DWG. NO.	REV.
PROJECT #	0992.14.21		Figure 3	3

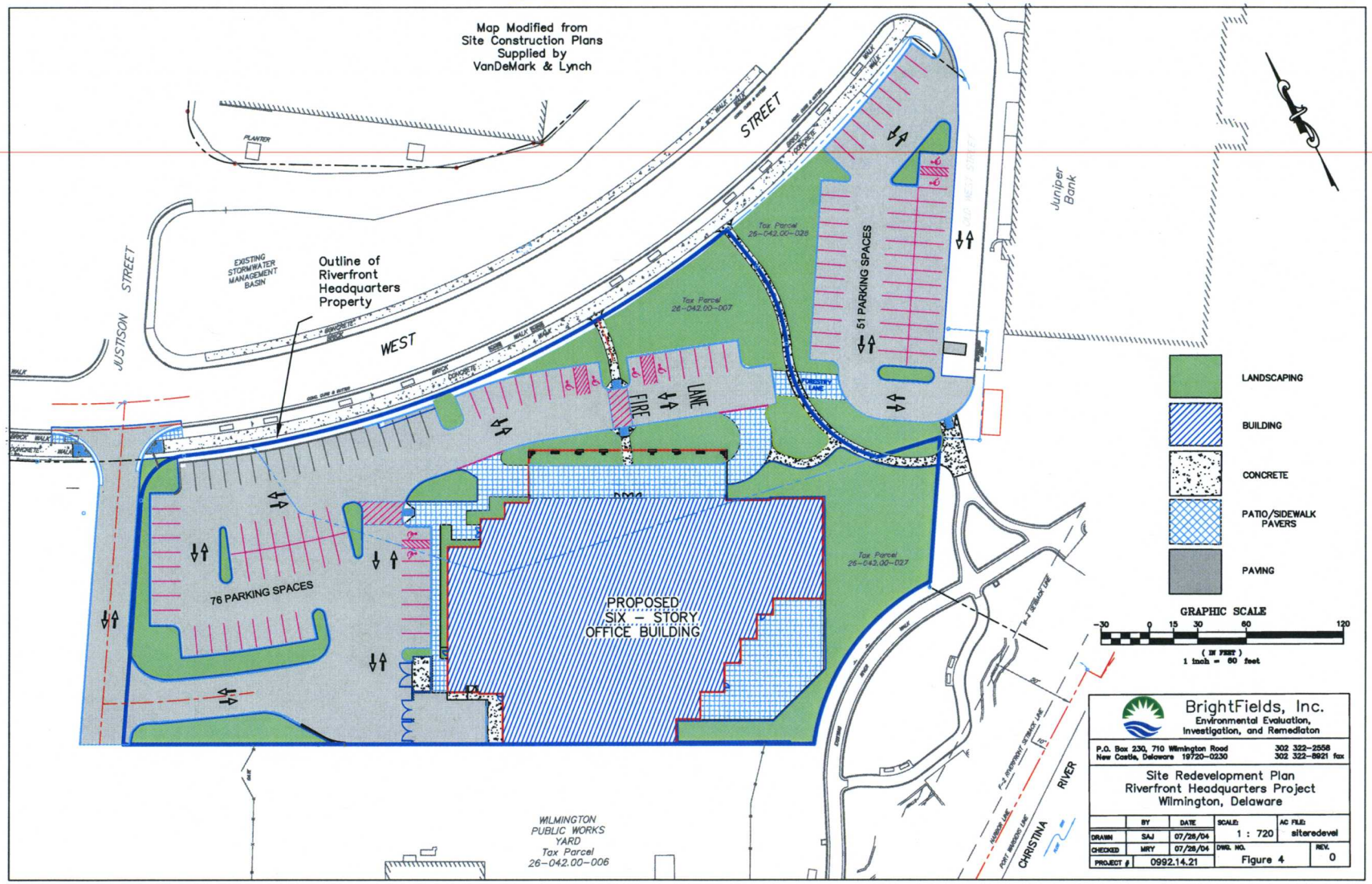
Map Modified from
Site Construction Plans
Supplied by
VanDeMark & Lynch
STREET
JUSTISON STREET
WEST
EXISTING STORMWATER MANAGEMENT BASIN
Outline of
Riverfront
Headquarters
Property
Tax Parcel
26-042.00-028
51 PARKING SPACES
Juniper
Bank
Tax Parcel
26-042.00-007
FIRE LANE
76 PARKING SPACES
PROPOSED
SIX - STORY
OFFICE BUILDING
Tax Parcel
26-042.00-027
WILMINGTON
PUBLIC WORKS
YARD
Tax Parcel
26-042.00-006
CHRISTINA
RIVER
LANDSCAPING
BUILDING
CONCRETE
PATIO/SIDEWALK
PAVERS
PAVING
GRAPHIC SCALE
-30 0 15 30 60 120
(IN FEET)
1 inch = 60 feet
BrightFields, Inc.
Environmental Evaluation,
Investigation, and Remediation
P.O. Box 230, 710 Wilmington Road
New Castle, Delaware 19720-0230
302 322-2558
302 322-8921 fax
Site Redevelopment Plan
Riverfront Headquarters Project
Wilmington, Delaware
BY DATE SCALE: AC FILE:
DRAWN SAJ 07/28/04 1 : 720 siteredevel
CHECKED MRY 07/28/04 DWG. NO. REV.
PROJECT # 0992.14.21 Figure 4 0

TABLE 1
Non-HSCA Soil Analytical Results - Existing Data
Riverfront Headquarters RI

Sample ID	DNREC URS Non-Critical Water Resource Area (12/99)		T5-4'		T5-9'		WY-GP8-S00		WY-GP8-S00		WY-GP9-S00		WY-GP9-S00	
Sample Date/Investig			11/12/94 EA Christina River Pedestrian Walkway		11/12/94 EA Christina River Pedestrian Walkway		02/26/01 WIK Public Works Yard RI		02/26/01 WIK Public Works Yard RI		02/26/01 WIK Public Works Yard RI		02/26/01 WIK Public Works Yard RI	
Sample Depth			4'		9'		0-2.0		2.7-3.4		0-2.0		5.0-5.7	
Laboratory	Unrestricted Us	Restricted Use	IAL		IAL		STL		STL		STL		STL	
Units	mg/kg	mg/kg	mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		mg/kg	
TAL Metals														
Aluminum	7,800	200,000	**8,120**		**24,000**		NA		NA		NA		NA	
Antimony	3	82	2.46	U	3.31	U	NA		NA		NA		NA	
Arsenic	11[t]	11[t]	**11.7**		7.5		1.1		8.7		1.0		0.83	U
Barium	550	14,000	152		148		48.8		176		57.5		12	B
Berylium	16	410	0.434		1.21		NA		NA		NA		NA	
Cadmium	4	100	0.459		0.331	U	0.085	U	0.5	B	0.11	B	0.093	U
Calcium	nca	nca	4,620		2,830		NA		NA		NA		NA	
Chromium	12,000	310,000	29.5		47.2		15.5		20.5		9.5		6	
Cobalt	470	12,000	5.34		17.0		NA		NA		NA		NA	
Copper	310	8,200	55.6		37.2		NA		NA		NA		NA	
Iron	2,300	61,000	**28,400**		**35,800**		NA		NA		NA		NA	
Lead	400	1,000	**658**		121		20.1		**1,100**		16.1		4.7	
Magnesium	nca	nca	1,720		5,900		NA		NA		NA		NA	
Manganese	160	4,100	139		**1,350**		NA		NA		NA		NA	
Mercury	10	610	1.36		0.304		0.018	U	0.67		1.1		0.017	U
Nickel	160	4,100	13.2		33.1		NA		NA		NA		NA	
Potassium	nca	nca	1,520		2,380		NA		NA		NA		NA	
Selenium	39	1,000	2.46	U	3.31	U	0.96	U	1.0	U	0.88	U	1.0	U
Silver	39	1,000	0.608	U	0.824	U	0.23	U	0.26	U	0.21	U	0.25	U
Sodium	nca	nca	217		426		NA		NA		NA		NA	
Thallium	18	220	0.0983	U	0.132	U	NA		NA		NA		NA	
Vanadium	55	1,400	25.0		45.6		NA		NA		NA		NA	
Zinc	2,300	61,000	344		121		NA		NA		NA		NA	
Wet Chemistry														
Cyanide	160	4,100	NA		NA		0.5	U	0.5	U	0.5	U	0.5	U
VOCs														
xylenes	420	5,000	0.908		0.723	U	0.610	U	0.600	U	0.550	U	0.710	U
cis-1,2-Dichloroethene	78	2,000					0.61	U	0.062	J	0.55	U	0.71	U
All other VOCs were not detected														
Pesticides/PCBs														
Aroclor-1248	0.3	3	0.346	U	0.456	U	0.071	U	0.078	U	**4.2**		0.078	U
Aroclor-1254	0.3	3	0.346	U	0.456	U	0.071	U	0.078	U	**6.0**		0.078	U
All other Pesticides/PCBs were not detected														
SVOCs														
fluorene	310	5,000					0.017	J	0.066	J	0.0082	J	0.39	J
Phenanthrene	1,000	5,000	0.272		0.158	U	0.17	J	0.39		0.084	J	7.7	
anthracene	1,000	5,000					0.041	J	0.078	J	0.028	J	0.69	J
fluoranthene	310	5,000	0.354		0.158	U	0.25	J	0.33	J	0.14	J	11	
pyrene	230	5,000	0.407		0.158	U	0.35	J	0.53		0.16	J	9.6	
benzo(a)anthracene	0.9	8	0.240		0.158	U	0.11		0.15		0.070		3.1	
chrysene	87	780	0.234		0.158	U	0.13	J	0.26	J	0.11	J	5.0	
bis(2-ethylhexyl)phtha	46	410	0.120	U	0.158	U								
benzo(b)fluoranthene	0.9	8	0.247		0.158	U	0.22		0.31		0.036	U	4.5	
benzo(k)fluoranthene	9	78	0.0886	J	0.158	U	0.081		0.10		0.036	U	1.7	
benzo(a)pyrene	0.09	0.8	**0.212**		0.158	U	**0.13**		**0.19**		**0.096**		**3.5**	
Indeno(1,2,3-cd)pyrene	0.9	8	0.0863	J	0.158	U	0.062		0.039	U	0.076		**2.1**	
dibenz(ah)anthracene	0.09	0.8					0.035	U	0.039	U	0.023	J	**0.52**	
benzo(ghi)perylene	nca	nca	0.115	J	0.158	U	0.050	J	0.39	U	0.057	J	2.0	
Naphthalene	160	4,100					0.014	J	0.098	J	0.016	J	0.074	J
Acenaphthylene	nca	nca					0.030	J	0.056	J	0.050	J	0.42	J
Acenaphthene	470	5,000					0.013	J	0.055	J	0.36	U	0.28	J
All other SVOCs were not detected														

[t] - Delaware background concentration (DNREC, 2002)
nca - no criteria available
NA - Not Analyzed
U - Compound was not detected at the indicated method detection limit
J - Estimated concentration
Empty gray shaded cells - no results reported
Bold - Compound exceeds unrestricted use URS
Shaded - Compound exceeds restricted use URS

Table 2
HSCA Soil Analytical Results - Inorganics
Riverfront Headquarters RI

Sample ID	DNREC URS for Non Critical Water Resource Area (12/99)		Validated RHQ1-S001		RHQ1-S002		RHQ2-S001		RHQ3-S001		Validated RHQ3-S002		RHQ4-S001		Validated RHQ5-S001		RHQ5-S002		RHQ6-S001	
Sample Date			2/3/04		2/3/04		2/4/04		2/3/04		2/3/04		2/4/04		2/4/04		2/4/04		2/4/04	
Sample Depth Units			0 - 2 mg/kg		8.5 - 9.5 mg/kg		0.2-2 mg/kg		1 - 2 mg/kg		8 - 10 mg/kg		0.3 - 2 mg/kg		0.2 - 2 mg/kg		12.5 - 14 mg/kg		0.2 - 2 mg/kg	
	Unrestricted Use	Restricted Use																		
TAL INORGANICS																				
Aluminum	7,800	200,000	**8,930**		**11,500**		**10,600**		**10,100**		**8,520**		**7,860**		**12,100**		**27,200**		**10,500**	
Antimony	3	82	2.24	U	2.48	U	2.29	U	0.805	J	**3.25**		2.28	U	2.31	U	3.02	U	2.26	U
Arsenic	11[t]	11[t]	4.06		5.81		5.38		9.77		**11.4**		5.81		**11.1**		6.65		**11.5**	
Barium	550	14,000	76.8		67.5		89.1		82.1		140		58		108		117		58.3	
Beryllium	16	410	0.311	J	0.403	J	0.412	J	0.497	J	0.346	J	0.338	J	0.498	J	0.936		0.488	J
Cadmium	4	100	0.561	UJ	0.117	J	0.572	U	0.564	U	2.4	J	0.569	U	0.578	U	0.755	U	0.565	U
Calcium	nca	nca	77,300		23,700		64,600		29,200		11,100		48,900		20,500		1,960		14,500	
Chromium	12,000	310,000	28.6		26.5		55.5		110		38.9	J	90.7		130		48.1		141	
Cobalt	470	12,000	7.83		9.51		14.7		38.4		31.2		31.7		37		10.9		46.2	
Copper	310	8,200	25.2		89.3		27.1		53.1		180		11.8		42.1		30.2		19.3	
Iron	2,300	61,000	**15,100**		**32,500**		**19,500**		**29,900**		**136,000**		**21,700**		**30,900**		**29,100**		**30,300**	
Lead	400	1,000	74.2		163		113		224		**413**		28.3		226		115		47	
Magnesium	nca	nca	33,100		9,220		28,400		63,200		4,140		64,600		64,400		4,940		79,400	
Manganese	160	4,100	**224**		**237**		**375**		**541**		**194**		**497**		**552**		**238**		**583**	
Mercury	10	610	0.474		0.561		0.109	J	0.207		0.272		0.0767	J	0.433		0.131	J	0.167	
Nickel	160	4,100	89.5		16.7		**255**		**907**		57.7		**694**		**801**		24.1		**1,040**	
Potassium	nca	nca	1,310	J	907		1,430		861		595	J	799		1,240	J	2,140		830	
Selenium	39	1,000	1.12	U	1.24	U	1.14	U	1.13	U	1.18	U	1.14	U	1.16	U	1.51	U	1.13	U
Silver	39	1,000	0.191	J	0.272	J	0.572	U	0.309	J	0.354	J	0.253	J	0.271	J	0.755	U	0.194	J
Sodium	nca	nca	308		374		325		408		102	J	846		596		237		100	J
Thallium	18	220	1.50	B	2.48	U	1.11	J	1.80	J	11.8	U	1.68	J	2.24	B	2.11	J	2.26	U
Vanadium	55	1,400	32.2		40.9		25.3		27.9		31.2		19.1		30.6		**56.3**		31.7	
Zinc	2,300	61,000	86.3		175		121		114		272		64.8		145		87.5		76.5	
Wet Chemsitry																				
Total Cyanide	160	4,100	2.8		0.62	U	0.73		1.1		0.6	U	0.56	U	1.1		0.77	U	0.55	J

Bold - Concentration exceeds Unrestricted Use URS
Shaded - Concentration exceeds Restricted Use URS
[t] - Delaware background concentration (DNREC, 2002)
nca- No criteria available
U - Compound not detected above laboratory detection limits
J - Concentration is estimated
B- Reported result is questionable value, blank contaminant
NA - Not analyzed

Table 2
HSCA Soil Analytical Results - Inorganics
Riverfront Headquarters RI

Sample ID	DNREC URS for Non Critical Water Resource Area (12/99)		RHQ6-S002		Validated RHQ7-S001		RHQ7-S002		RHQ8-S001		Validated RHQ8-S002		RHQ9-S001		RHQ9-S002		RHQ10-S001		Validated RHQ10-S002	
Sample Date			2/4/04		2/3/04		2/3/04		2/4/04		2/4/04		2/4/04		2/4/04		2/4/04		2/4/04	
Sample Depth Units			4.2 - 6.7 mg/kg		0.2 - 2 mg/kg		6 - 7.5 mg/kg		0.2 - 2 mg/kg		5.4 - 6 mg/kg		0.3 - 2 mg/kg		9.4 - 11.4 mg/kg		0.4 - 2 mg/kg		4.8 - 6 mg/kg	
	Unrestricted Use	Restricted Use																		
TAL INORGANICS																				
Aluminum	7,800	200,000	**9,010**		4,430		**14,200**		**8,390**		**9,390**		7,680		**16,100**		**16,200**		**11,100**	
Antimony	3	82	**3.54**		2.29	U	1.89	J	2.19	U	2.46		0.885	J	1.85	J	0.754	J	2.31	U
Arsenic	11[t]	11[t]	**25.2**		**14.1**		**13.1**		7.74		**18.9**		6.78		**15.8**		**20.9**		4.37	
Barium	550	14,000	480		16.7		405		89.8		333		63		186		55.2		47.9	
Beryllium	16	410	0.561	J	0.333	J	0.553	J	0.392	J	0.527	J	0.381	J	0.646	J	1.18		0.249	J
Cadmium	4	100	2.2		0.572	UJ	1.55		0.548	U	1.36	J	0.552	U	2.06		1.31		0.904	J
Calcium	nca	nca	6,190		5,400		11,700		32,500		5,190		51,200		6,430		2,040		3,650	
Chromium	12,000	310,000	77.8		233	J	33.4		98		22.6	J	107		33.2		154		24.8	J
Cobalt	470	12,000	22.2		57.4		17.8		27		17.7		31.7		19.9		7.13		6.94	
Copper	310	8,200	**314**		3.77		128		13.2		167		33.8		84.7		8.39		61	
Iron	2,300	61,000	**98,700**		**30,000**		**68,000**		**22,700**		**62,600**		**25,400**		**84,500**		**54,900**		**38,200**	
Lead	400	1,000	**2,830**		3.08		**2,500**		51		**1,360**		253		**1,160**		46.3		103	
Magnesium	nca	nca	2,460		103,000		2,380		47,900		1,110		70,700		3,270		2,770		960	
Manganese	160	4,100	**469**		**708**		**424**		**407**		**273**		**388**		**299**		**163**		142	
Mercury	10	610	6.76		0.009	B	1.62		0.116		1.4		0.154		0.406		0.0422	J	0.0866	J
Nickel	160	4,100	64.9		**1,540**		29.6		**603**		27.8		**712**		31.2		12.2		10.5	
Potassium	nca	nca	959		196	J	1,210		667		667	J	833		1,200		5,180		825	J
Selenium	39	1,000	1.14	U	1.14	U	1.28	U	1.1	U	0.832	J	1.1	U	1.4	U	1.12	U	1.15	U
Silver	39	1,000	0.559	J	0.572	U	0.292	J	0.204	J	0.53	J	0.287	J	0.473	J	0.17	J	0.208	J
Sodium	nca	nca	88.4	J	180		186		134		195		356		502		3,360		1,520	
Thallium	18	220	3.72		2.29	U	2.57		1.94	J	3.47	B	2.21	U	3.46		1.96	J	1.46	B
Vanadium	55	1,400	29.7		7.41		33.5		20.6		28.4		21.5		39.9		**89.8**		29.1	
Zinc	2,300	61,000	610		13		502		51.2		332		99.2		191		87.5		55.8	
Wet Chemsitry																				
Total Cyanide	160	4,100	0.57	U	0.58	U	0.64	U	0.55	U	0.6	U	0.63		0.7	U	0.56	U	0.57	U

Bold - Concentration exceeds Unrestricted Use URS
Shaded - Concentration exceeds Restricted Use URS
[t] - Delaware background concentration (DNREC, 2002)
nca- No criteria available
U - Compound not detected above laboratory detection limits
J - Concentration is estimated
B- Reported result is questionable value, blank contaminant
NA - Not analyzed

Table 2
HSCA Soil Analytical Results - Inorganics
Riverfront Headquarters RI

Sample ID	DNREC URS for Non Critical Water Resource Area (12/99)		RHQ11-S001		RHQ11-S002		RHQ12-S001		RHQ12-S002		PWY-GP9-S001		GP-651N-S001		GP-653A-S001	
Sample Date			2/4/04		2/4/04		2/3/04		2/3/04		2/26/01		12/7/98		12/7/98	
Sample Depth Units			0.1 - 2 mg/kg		5.8 - 6.8 mg/kg		0.2 - 2 mg/kg		6 - 7 mg/kg		0-2 mg/kg		16' mg/kg		16' mg/kg	
	Unrestricted Use	Restricted Use														
TAL INORGANICS																
Aluminum	7,800	200,000	**8,360**		**8,080**		**23,500**		**13,900**		6,860		**19,700**		**16,400**	
Antimony	3	82	0.941	J	**3.71**		2.44	U	**3.62**		0.83	U	1.5	U	1.1	U
Arsenic	11[t]	11[t]	4.02		**11.2**		5.98		7.69		1.3		4.8		5.1	
Barium	550	14,000	50.6		216		114		202		55.2		80.5		36.1	
Beryllium	16	410	0.346	J	0.344	J	0.933		0.512	J	0.56		1.1		0.74	
Cadmium	4	100	0.536	U	3.22	U	0.61	U	0.881		0.21	B	0.14	U	0.099	U
Calcium	nca	nca	23,000		6,430		3,860		1,690		22,400		2,550		1,240	
Chromium	12,000	310,000	15.8		13.9		31.4		27.8		12.9		48.3		25.8	
Cobalt	470	12,000	4.95		40.2		8.19		9.98		3.6	B	12.5		6.4	
Copper	310	8,200	29.7		181		12.6		87.9		26.3		10.1		10.5	
Iron	2,300	61,000	**36,300**		**124,000**		**21,700**		**48,300**		**11,500**		**24,700**		**35,600**	
Lead	400	1,000	44.1		**1,670**		21.3		**1,190**		47.2		12.3		8.2	
Magnesium	nca	nca	6,520		398		1,810		668		12,800		7,110		2,370	
Manganese	160	4,100	**273**		131		**609**		**161**		**264**		**255**		119	
Mercury	10	610	0.188		0.107	J	0.0483	J	1.97		3.3		0.029	U	0.021	U
Nickel	160	4,100	14.2		43.6		13.3		17.5		10.2		29.6		12.5	
Potassium	nca	nca	934		438		831		817		2,330		2,310		712	
Selenium	39	1,000	1.07	U	6.79		1.22	U	1.25	U	0.83	U	1.4	U	1	U
Silver	39	1,000	0.18	J	0.47	J	0.61	U	0.251	J	0.15	U	0.48	U	0.35	U
Sodium	nca	nca	96.4	J	115	J	122	U	65.5	J	261	B	467		161	
Thallium	18	220	2.14	U	3.44		2.44	U	2.42	J	0.94	U	1.5	U	1.1	U
Vanadium	55	1,400	25.1		20.4		52.4		45.6		19.7		48.3		48.8	
Zinc	2,300	61,000	38.7		186		42.5		207		56.5		75.2		29.6	
Wet Chemsitry																
Total Cyanide	160	4,100	0.24	J	0.64	U	0.61	U	0.64	U	1	U	NA		NA	

Bold - Concentration exceeds Unrestricted Use URS
Shaded - Concentration exceeds Restricted Use URS
[t] - Delaware background concentration (DNREC, 2002)
nca- No criteria available
U - Compound not detected above laboratory detection limits
J - Concentration is estimated
B- Reported result is questionable value, blank contaminant
NA - Not analyzed

Table 3
HSCA Soil Analytical Results - Pesticides/PCBs and VOCs
Riverfront Headquarters RI

Sample ID	DNREC URS for Non Critical Water Resource Area (12/99)		Validated RHQ1-S001	RHQ1-S002	RHQ2-S001	RHQ3-S001	Validated RHQ3-S002	RHQ4-S001	Validated RHQ5-S001	RHQ5-S002	RHQ6-S001
Sample Date			2/3/04	2/3/04	2/4/04	2/3/04	2/3/04	2/4/04	2/4/04	2/4/04	2/4/04
Sample Depth Units	Unrestricted Use	Restricted Use	0 - 2 µg/kg	8.5 - 9.5 µg/kg	0.2-2 µg/kg	1 - 2 µg/kg	8 - 10 µg/kg	0.3 - 2 µg/kg	0.2 - 2 µg/kg	12.5 - 14 µg/kg	0.2 - 2 µg/kg
TCL PESTICIDES/PCBS											
Alpha BHC	100	900	9.4 U	11 U	4.8 U	4.7 U	2.1 J	4.8 U	4.8 U	1.3 U	0.97 U
Alpha Chlordane	2,000	16,000	9.4 U	11 U	6.6 U	4.7 U	10 UJ	5.1 U	4.8 U	1.3 U	3.6 U
Endosulfan II	47,000	1,200,000	19 U	22 U	9.8 U	9.6 U	21 UJ	9.8 U	9.8 U	2.6 U	2.1 U
Endosulfan Sulfate	47,000	1,200,000	19 U	22 U	9.8 U	9.6 U	21 UJ	9.8 U	9.8 U	2.6 U	2 U
Gamma Chlordane	2,000	16,000	10 U	11 U	5.2 U	5.1 U	11 UJ	5.2 U	5.2 U	1.4 U	3.3 U
Heptachlor Epoxide	70	600	9.7 U	11 U	8 U	4.7 U	10 UJ	4.8 U	4.8 U	1.3 U	1.6 U
p,p-DDD	3,000	24,000	19 U	22 U	9.8 U	9.6 U	21 UJ	9.8 U	9.8 U	2.6 U	2 U
p,p-DDE	2,000	17,000	19 U	22 U	10 U	9.6 U	6.9 UJ	17 U	9.8 U	2.6 U	5.4 U
p,p-DDT	2,000	17,000	19 U	22 U	9.8 U	9.6 U	18 UJ	9.8 U	9.8 U	2.6 U	23 U
Toxaphene	600	5,000	590 U	420 U	190 U	880 U	400 UJ	190 U	190 U	51 U	38 U
PCB-1248	300	3,000	200 U	230 U	100 U	100 U	220 UJ	100 U	100 U	28 U	21 U
PCB-1254	300	3,000	190 J	**340**	**350**	**380**	210 UJ	270	**520**	26 U	130
PCB-1260	300	3,000	290	**2,800**	98 U	**420**	210 UJ	98 U	**1100**	26 U	240
All other Pesticides/PCBs were not detected											
TCL VOCS											
Benzene	800	200,000	360 J	700 U	280 U	430 U	120 J	280 U	39 J	390 U	290 U
Ethylbenzene	400,000	5,000,000	360 J	700 U	280 U	100 J	300 U	280 U	270 U	390 U	290 U
Tetrachloroethene	11,000	110,000	360 J	700 U	100 J	430 U	300 U	100 J	270 U	390 U	290 U
Toluene	650,000	5,000,000	360 J	700 U	62 J	120 J	110 J	280 U	270 U	390 U	290 U
Xylene (Total)	420,000	5,000,000	360 J	700 U	280 U	140 J	130 J	280 U	270 U	390 U	290 U
All other VOCs were not detected											

Bold - Concentration exceeds Unrestricted Use URS
Shaded - Concentration exceeds Restricted Use URS
[1] - Delaware default background standard (December 1999)
nca- No criteria available
U - compound was not detected above laboratory detection limits
J - Concentration is estimated

Table 3
HSCA Soil Analytical Results - Pesticides/PCBs and VOCs
Riverfront Headquarters RI

Sample ID	DNREC URS for Non Critical Water Resource Area (12/99)		RHQ6-S002	Validated RHQ7-S001	RHQ7-S002	RHQ8-S001	Validated RHQ8-S002	RHQ9-S001	RHQ9-S002	RHQ10-S001	Validated RHQ10-S002
Sample Date			2/4/04	2/3/04	2/3/04	2/4/04	2/4/04	2/4/04	2/4/04	2/4/04	2/4/04
Sample Depth Units			4.2 - 6.7 µg/kg	0.2 - 2 µg/kg	6 - 7.5 µg/kg	0.2 - 2 µg/kg	5.4 - 6 µg/kg	0.3 - 2 µg/kg	9.4 - 11.4 µg/kg	0.4 - 2 µg/kg	4.8 - 6 µg/kg
	Unrestricted Use	Restricted Use									
TCL PESTICIDES/PCBS											
Alpha BHC	100	900	4.9 U	0.97 U	1.1 U	9.3 U	5.1 U	4.8 U	5.9 U	4.7 U	0.98 U
Alpha Chlordane	2,000	16,000	4.9 U	0.97 U	1.1 U	9.3 U	5.1 U	4.8 U	5.9 U	4.7 U	0.98 U
Endosulfan II	47,000	1,200,000	10 U	2 U	2.3 U	19 U	5.5 J	9.8 U	12 U	9.7 U	2 U
Endosulfan Sulfate	47,000	1,200,000	5 J	2 U	2.3 U	19 U	3.8 J	9.8 U	7.4 J	9.7 U	0.56 J
Gamma Chlordane	2,000	16,000	5.3 U	1.1 U	1.2 U	10 U	5.5 U	5.2 U	6.4 U	5.1 U	1.1 U
Heptachlor Epoxide	70	600	4.9 U	0.97 U	0.42 J	9.3 U	5.1 U	4.8 U	5.9 U	4.7 U	0.98 U
p,p-DDD	3,000	24,000	7.8 J	2 U	2.3 U	19 U	10 U	9.8 U	12 U	9.7 U	2 U
p,p-DDE	2,000	17,000	12	2 U	2.3 U	37	10 U	10 U	12 U	9.7 U	2 U
p,p-DDT	2,000	17,000	4.1 J	2 U	2.5 U	34	10 U	9.8 U	12 U	9.7 U	2 U
Toxaphene	600	5,000	190 U	33 J	91	370 U	200 U	190 U	240 U	190 U	39 U
PCB-1248	300	3,000	110 U	21 U	24 U	200 U	110 U	100 U	130 U	100 U	21 U
PCB-1254	300	3,000	100 U	13 J	23 U	190 U	100 U	**330**	120 U	97 U	20 U
PCB-1260	300	3,000	100 U	12 J	23 U	190 U	100 U	**340**	120 U	97 U	20 U
All other Pesticides/PCBs were not detected											
TCL VOCS											
Benzene	800	200,000	350 U	710 U	330 U	260 U	310 U	260 U	340 U	270 U	300 U
Ethylbenzene	400,000	5,000,000	350 U	710 U	330 U	260 U	310 U	260 U	340 U	270 U	300 U
Tetrachloroethene	11,000	110,000	350 U	710 U	330 U	260 U	310 U	68 J	340 U	270 U	300 U
Toluene	650,000	5,000,000	350 U	710 U	330 U	260 U	310 U	260 U	340 U	270 U	300 U
Xylene (Total)	420,000	5,000,000	350 U	710 U	330 U	260 U	310 U	260 U	340 U	270 U	300 U
All other VOCs were not detected											

Bold - Concentration exceeds Unrestricted Use URS
Shaded - Concentration exceeds Restricted Use URS
[t] - Delaware default background standard (December 1999)
nca- No criteria available
U - compound was not detected above laboratory detection limits
J - Concentration is estimated

Table 3
HSCA Soil Analytical Results - Pesticides/PCBs and VOCs
Riverfront Headquarters RI

Sample ID	DNREC URS for Non Critical Water Resource Area (12/99)		RHQ11-S001	RHQ11-S002	RHQ12-S001	RHQ12-S002	PWY-GP9-S001	GP-651N-S001	GP-653A-S001
Sample Date			2/4/04	2/4/04	2/3/04	2/3/04	2/26/01	12/7/98	12/7/98
Sample Depth			0.1 - 2	5.8 - 6.8	0.2 - 2	6 - 7	0-2	16'	16'
Units	Unrestricted Use	Restricted Use	µg/kg	µg/kg	µg/kg	µg/kg	µg/kg	µg/kg	µg/kg
TCL PESTICIDES/PCBS									
Alpha BHC	100	900	4.4 U	11 U	1 U	5.3 U	NA	NA	NA
Alpha Chlordane	2,000	16,000	2.6 J	11 U	1 U	5.3 U	NA	NA	NA
Endosulfan II	47,000	1,200,000	9.1 U	22 U	2.1 U	11 U	NA	NA	NA
Endosulfan Sulfate	47,000	1,200,000	9.1 U	22 U	2.1 U	11 U	NA	NA	NA
Gamma Chlordane	2,000	16,000	4.1 J	12 U	1.1 U	5.8 U	NA	NA	NA
Heptachlor Epoxide	70	600	4.4 U	11 U	1 U	5.3 U	NA	NA	NA
p,p-DDD	3,000	24,000	13	22 U	2.1 U	11 U	NA	NA	NA
p,p-DDE	2,000	17,000	4.3 J	22 U	2.1 U	11 U	NA	NA	NA
p,p-DDT	2,000	17,000	9.1 U	22 U	2.1 U	11 U	NA	NA	NA
Toxaphene	600	5,000	180 U	430 U	30 J	210 U	NA	NA	NA
PCB-1248	300	3,000	96 U	240 U	22 U	120 U	**5,800**	110 U	83 U
PCB-1254	300	3,000	91 U	220 U	21 U	110 U	**9,000**	110 U	83 U
PCB-1260	300	3,000	91 U	220 U	19 J	110 U	NA	110 U	83 U
All other Pesticides/PCBs were not detected									
TCL VOCS									
Benzene	800	200,000	280 U	330 U	390 U	330 U	110 U	260 U	130 U
Ethylbenzene	400,000	5,000,000	280 U	330 U	390 U	330 U	440 U	1000 U	540 U
Tetrachloroethene	11,000	110,000	280 U	330 U	390 U	330 U	110 U	260 U	130 U
Toluene	650,000	5,000,000	280 U	330 U	390 U	330 U	550 U	1300 U	670 U
Xylene (Total)	420,000	5,000,000	280 U	330 U	390 U	330 U	550 U	1300 U	670 U
All other VOCs were not detected									

Bold - Concentration exceeds Unrestricted Use URS
Shaded - Concentration exceeds Restricted Use URS
[t] - Delaware default background standard (December 1999)
nca- No criteria available
U - compound was not detected above laboratory detection limits
J - Concentration is estimated

Table 4
HSCA Soil Analytical Results - SVOCs
Riverfront Headquarters RI

Sample ID	DNREC URS for Non Critical Water Resource Area (12/99)		Validated RHQ1-S001	RHQ1-S002	RHQ2-S001	RHQ3-S001	Validated RHQ3-S002	RHQ4-S001	Validated RHQ5-S001	RHQ5-S002	RHQ6-S001
Sample Date			2/3/04	2/3/04	2/4/04	2/3/04	2/3/04	2/4/04	2/4/04	2/4/04	2/4/04
Sample Depth Units	Unrestricted Use	Restricted Use	0 - 2 µg/kg	8.5 - 9.5 µg/kg	0.2-2 µg/kg	1 - 2 µg/kg	8 - 10 µg/kg	0.3 - 2 µg/kg	0.2 - 2 µg/kg	12.5 - 14 µg/kg	0.2 - 2 µg/kg
TCL SVOCS											
1,2,4-Trichlorobenzene	78,000	2,000,000	380 U	420 U	390 U	380 U	410 U	380 U	390 U	520 U	390 U
1,4-Dichlorobenzene	27,000	240,000	380 U	420 U	390 U	380 U	410 U	380 U	390 U	520 U	390 U
2,4-Dimethylphenol	160,000	5,000,000	380 U	49 J	390 U	380 U	150 J	380 U	390 U	520 U	390 U
2-Methylnaphthalene	160,000	4,100,000	46 J	560	59 J	100 J	280 J	380 U	83 J	58 J	390 U
4-Methylphenol	39,000	5,000,000	380 U	420 U	390 U	380 U	410 U	380 U	390 U	520 U	390 U
Acenaphthene	470,000	5,000,000	61 J	1200	94 J	190 J	320 J	56 J	91 J	520 U	390 U
Acenaphthylene	nca	nca	99 J	200 J	79 J	190 J	190 J	380 U	160 J	52 J	390 U
Anthracene	1,000,000	5,000,000	160 J	2,300	280 J	370 J	480	100 J	270 J	240 J	82 J
Benzo(a)anthracene	900	8,000	480	**2,800**	560	**1,300**	**1,000**	260 J	880	650	320 J
Benzo(a)pyrene	90	800	**450**	**2,000**	**460**	**1,200**	**800**	**240 J**	**850**	**490 J**	**340 J**
Benzo(b)fluoranthene	900	8,000	660	**2,600**	570	**1,600**	**1,100**	310 J	**1,200**	580	410
Benzo(g,h,i)perylene	nca	nca	170 J	450	240 J	430	290 J	100 J	390	190 J	230 J
Benzo(k)fluoranthene	9,000	78,000	240 J	900	250 J	670	430	140 J	430	280 J	190 J
bis(2-Ethylhexyl)phthalate	46,000	410,000	380 U	420 U	390 U	380 U	410 U	380 U	390 U	520 U	390 U
Carbazole	32,000	290,000	64 J	960	92 J	170 J	170 J	45 J	100 J	520 U	390 U
Chrysene	87,000	780,000	570	2,500	600	1,300	1,000	290 J	940	590	340 J
Dibenz(a,h)anthracene	90	800	**97 J**	**240 J**	88 J	**190 J**	**120 J**	40 J	**160 J**	**94 J**	69 J
Dibenzofuran	31,000	820,000	63 J	1,000	74 J	140 J	270 J	380 U	95 J	53 J	390 U
Di-n-octylphthalate	160,000	4,100,000	380 U	420 U	390 U	380 U	410 U	380 U	390 U	520 U	390 U
Fluoranthene	310,000	5,000,000	930	5,400	1,300	2,200	2,100	540	1,700	1,000	580
Fluorene	310,000	5,000,000	72 J	1,500	90 J	190 J	490	46 J	130 J	120 J	390 U
Indeno(1,2,3-cd)pyrene	900	8,000	230 J	620	260 J	550	340 J	120 J	490	240 J	250 J
Naphthalene	160,000	4,100,000	59 J	680	60 J	220 J	160 J	380 U	110 J	76 J	390 U
Phenol	1,000,000	5,000,000	380 U	420 U	390 U	380 U	410 U	380 U	390 U	520 U	390 U
Phenanthrene	1,000,000	5,000,000	720	7,400	940	1,500	2,000	380 J	1,200	690	300 J
Pyrene	230,000	5,000,000	950	5,000	1,200	2,200	1,900	520	1,700	1,000	680
All other SVOCs were not detected											

Bold - Concentration exceeds Unrestricted Use URS
Shaded - Concentration exceeds Restricted Use URS
[1] - Delaware default background standard (December 1999)
nca- No criteria available
U - compound was not detected above laboratory detection limits
J - Concentration is estimated

Table 4
HSCA Soil Analytical Results - SVOCs
Riverfront Headquarters RI

Sample ID	DNREC URS for Non Critical Water Resource Area (12/99)		RHQ6-S002	Validated RHQ7-S001	RHQ7-S002	RHQ8-S001	Validated RHQ8-S002	RHQ9-S001	RHQ9-S002	RHQ10-S001	Validated RHQ10-S002
Sample Date			2/4/04	2/3/04	2/3/04	2/4/04	2/4/04	2/4/04	2/4/04	2/4/04	2/4/04
Sample Depth Units	Unrestricted Use	Restricted Use	4.2 - 6.7 µg/kg	0.2 - 2 µg/kg	6 - 7.5 µg/kg	0.2 - 2 µg/kg	5.4 - 6 µg/kg	0.3 - 2 µg/kg	9.4 - 11.4 µg/kg	0.4 - 2 µg/kg	4.8 - 6 µg/kg
TCL SVOCS											
1,2,4-Trichlorobenzene	78,000	2,000,000	390 U	390 U	440 U	370 U	410 U	380 U	480 U	380 U	390 U
1,4-Dichlorobenzene	27,000	240,000	390 U	390 U	440 U	370 U	410 U	380 U	480 U	380 U	390 U
2,4-Dimethylphenol	160,000	5,000,000	390 U	390 U	440 U	370 U	410 U	380 U	480 U	380 U	390 U
2-Methylnaphthalene	160,000	4,100,000	210 J	390 U	440 U	370 U	44 J	45 J	240 J	380 U	390 U
4-Methylphenol	39,000	5,000,000	390 U	390 U	440 U	370 U	410 U	380 U	480 U	380 U	390 U
Acenaphthene	470,000	5,000,000	220 J	390 U	70 J	41 J	75 J	50 J	360 J	380 U	390 U
Acenaphthylene	nca	nca	160 J	390 U	440 U	370 U	64 J	51 J	200 J	380 U	390 U
Anthracene	1,000,000	5,000,000	730	390 U	84 J	85 J	200 J	120 J	1,000	380 U	49 J
Benzo(a)anthracene	900	8,000	**1,800**	390 U	330 J	210 J	840	380	**3,300**	73 J	220 J
Benzo(a)pyrene	90	800	**1,700**	**390 U**	**300 J**	**200 J**	**1,100**	**350 J**	**3,600**	88 J	**240 J**
Benzo(b)fluoranthene	900	8,000	**2,100**	390 U	370 J	250 J	**1,500**	460	**3,900**	92 J	260 J
Benzo(g,h,i)perylene	nca	nca	1,100	390 U	180 J	130 J	1,200	190 J	1,700	54 J	120 J
Benzo(k)fluoranthene	9,000	78,000	930	390 U	180 J	120 J	590	220 J	1,800	43 J	120 J
bis(2-Ethylhexyl)phthalate	46,000	410,000	390 U	390 U	440 U	370 U	410 U	380 U	480 U	380 U	390 U
Carbazole	32,000	290,000	150 J	390 U	440 U	41 J	84 J	47 J	100 J	380 U	390 U
Chrysene	87,000	780,000	2,000	390 U	340 J	230 J	910	490	3,100	99 J	220 J
Dibenz(a,h)anthracene	90	800	**370 J**	**390 U**	65 J	38 J	**300 J**	69 J	**650**	**380 U**	**390 U**
Dibenzofuran	31,000	820,000	220 J	390 U	440 U	370 U	53 J	44 J	210 J	380 U	390 U
Di-n-octylphthalate	160,000	4,100,000	390 U	390 U	440 U	370 U	410 U	380 U	480 U	380 U	390 U
Fluoranthene	310,000	5,000,000	3,000	390 U	500	430	1,200	710	4,200	99 J	320 J
Fluorene	310,000	5,000,000	310 J	390 U	440 U	39 J	71 J	52 J	380 J	380 U	390 U
Indeno(1,2,3-cd)pyrene	900	8,000	**1,100**	390 U	200 J	140 J	**1,200**	250 J	**2,200**	49 J	140 J
Naphthalene	160,000	4,100,000	220 J	390 U	440 U	370 U	49 J	62 J	650	380 U	390 U
Phenol	1,000,000	5,000,000	390 U	390 U	440 U	370 U	410 U	380 U	480 U	380 U	390 U
Phenanthrene	1,000,000	5,000,000	2,600	390 U	320 J	380	750	540	2,100	62 J	230 J
Pyrene	230,000	5,000,000	3,500	390 U	500	440	1,200	810	4,300	120 J	400
All other SVOCs were not detected											

Bold - Concentration exceeds Unrestricted Use URS
Shaded - Concentration exceeds Restricted Use URS
[1] - Delaware default background standard (December 1999)
nca- No criteria available
U - compound was not detected above laboratory detection limits
J - Concentration is estimated

Table 4
HSCA Soil Analytical Results - SVOCs
Riverfront Headquarters RI

Sample ID	DNREC URS for Non Critical Water Resource Area (12/99)		RHQ11-S001	RHQ11-S002	RHQ12-S001	RHQ12-S002	PWY-GP9-S001	GP-651N-S001	GP-653A-S001
Sample Date			2/4/04	2/4/04	2/3/04	2/3/04	2/26/01	12/7/98	12/7/98
Sample Depth			0.1 - 2	5.8 - 6.8	0.2 - 2	6 - 7	0-2	16'	16'
Units	Unrestricted Use	Restricted Use	µg/kg	µg/kg	µg/kg	µg/kg	µg/kg	µg/kg	µg/kg
TCL SVOCS									
1,2,4-Trichlorobenzene	78,000	2,000,000	3,600 U	440 U	420 U	430 U	67	57 U	41 U
1,4-Dichlorobenzene	27,000	240,000	3,600 U	440 U	420 U	430 U	7.5 J	570 U	410 U
2,4-Dimethylphenol	160,000	5,000,000	3,600 U	440 U	420 U	430 U	350 U	570 U	410 U
2-Methylnaphthalene	160,000	4,100,000	3,600 U	66 J	420 U	400 J	27 J	570 U	410 U
4-Methylphenol	39,000	5,000,000	3,600 U	440 U	420 U	110 J	350 U	570 U	410 U
Acenaphthene	470,000	5,000,000	3,600 U	440 U	420 U	420 J	350 U	570 U	410 U
Acenaphthylene	nca	nca	3,600 U	440 U	420 U	420 J	76 J	570 U	410 U
Anthracene	1,000,000	5,000,000	3,600 U	440 U	420 U	960	26 J	570 U	410 U
Benzo(a)anthracene	900	8,000	**3,600 U**	110 J	420 U	**2,100**	84	57 U	41 U
Benzo(a)pyrene	90	800	**3,600 U**	87 J	**420 U**	**2,000**	**130**	57 U	41 U
Benzo(b)fluoranthene	900	8,000	**3,600 U**	130 J	420 U	**2,500**	260	57 U	41 U
Benzo(g,h,i)perylene	nca	nca	3,600 U	53 J	420 U	960	66 J	570 U	410 U
Benzo(k)fluoranthene	9,000	78,000	**3,600 U**	62 J	420 U	1,200	63	57 U	41 U
bis(2-Ethylhexyl)phthalate	46,000	410,000	2,500 J	470	420 U	430 U	350 U	570 U	410 U
Carbazole	32,000	290,000	3,600 U	440 U	420 U	320 J	9.2 J	570 U	410 U
Chrysene	87,000	780,000	3,600 U	170 J	420 U	2,200	100 J	570 U	410 U
Dibenz(a,h)anthracene	90	800	**3,600 U**	**440 U**	**420 U**	**350 J**	35 U	57 U	41 U
Dibenzofuran	31,000	820,000	3,600 U	440 U	420 U	540	7.4 J	570 U	410 U
Di-n-octylphthalate	160,000	4,100,000	3,600 U	500	420 U	430 U	350 U	570 U	410 U
Fluoranthene	310,000	5,000,000	3,600 U	170 J	420 U	4,100	130 J	570 U	410 U
Fluorene	310,000	5,000,000	3,600 U	440 U	420 U	900	14 J	570 U	410 U
Indeno(1,2,3-cd)pyrene	900	8,000	**3,600 U**	52 J	420 U	**1,200**	95	57 U	41 U
Naphthalene	160,000	4,100,000	3,600 U	44 J	420 U	290 J	57 J	570 U	410 U
Phenol	1,000,000	5,000,000	3,600 U	440 U	420 U	430 U	350 U	62 J	56 J
Phenanthrene	1,000,000	5,000,000	3,600 U	280 J	420 U	4,500	88 J	570 U	410 U
Pyrene	230,000	5,000,000	3,600 U	150 J	420 U	4,400	230 J	570 U	410 U
All other SVOCs were not detected									

Bold - Concentration exceeds Unrestricted Use URS
Shaded - Concentration exceeds Restricted Use URS
[1] - Delaware default background standard (December 1999)
nca- No criteria available
U - compound was not detected above laboratory detection limits
J - Concentration is estimated

Table 5
HSCA Groundwater Analytical Results - Inorganics
Riverfront Headquarters RI

Sample ID	URS for Protection of Human-Health in Groundwater (12/99)	RHQ1-W001		RHQ3-W001		RHQ7-W001		RHQ12-W001	
Sample Date		2/3/04		2/3/04		2/3/04		2/3/04	
Screen set at (ft - ft)		8-18		5-15		6-16		4-14	
Units		µg/l		µg/l		µg/l		µg/l	
Metals									
Aluminum	200	840	U	41.3	U	41.3	U	41.3	U
Antimony	6	8.5	U	8.5	U	8.5	U	8.5	U
Arsenic	50	4.9	U	4.9	U	4.9	U	4.9	U
Barium	260	238		**271**		**910**		**421**	
Beryllium	4	0.34	U	0.34	U	0.34	U	0.34	U
Cadmium	5	0.87	U	0.87	U	0.87	U	0.87	U
Calcium	nca	90,800		123,000		123,000		33,100	
Chromium	100	2.2	U	2.2	U	2.2	U	2.2	U
Cobalt	220	1.6	U	1.6	U	1.6	U	1.6	U
Copper	1,300	2.1	U	2.1	U	2.1	U	2.1	U
Iron	300	**3,700**		**2,620**		**19,300**		**8,250**	
Lead	15	9.3	U	9.3	U	9.3	U	9.3	U
Magnesium	nca	24,800		71,500		24,500		6,410	
Manganese	50	**212**		**323**		**257**		48	
Mercury	2	0.16	U	0.16	U	0.16	U	0.16	U
Nickel	100	3.8	U	3.8	U	3.8	U	3.8	U
Potassium	nca	25,500	J	16,200	J	19,600	J	15,600	J
Selenium	50	4.7	U	4.7	U	5.2	J	4.7	U
Silver	100	1.8	U	1.8	U	1.8	U	1.8	U
Sodium	nca	472,000		49,000		72,400		212,000	
Thallium	2	8.9	U	8.9	U	8.9	U	8.9	U
Vanadium	26	1.7	U	1.7	U	1.7	U	1.7	U
Zinc	2,000	6.1	J	4.1	U	4.2	J	4.1	U
Wet Chemistry									
Chloride	nca	733,000		168,000		157,000		159,000	
Total Cyanide	200	10		7.3	J	12		44	

Bold - Concentration exceeds URS
nca- No criteria available
U - Compound was not detected above laboratory detection limits
J - Concentration is estimated
All groundwater data was validated

Table 6
HSCA Groundwater Analytical Results - Organics
Riverfront Headquarters RI

Sample ID Sample Date Screen set at (ft - ft) Units	URS for Protection of Human-Health in Groundwater (12/99)	RHQ1-W001 2/3/04 µg/l	RHQ3-W001 2/3/04 µg/l	RHQ7-W001 2/3/04 µg/l	RHQ12-W001 2/3/04 µg/l
Pesticides/PCBs					
Heptachlor Epoxide	0.2	0.013 J	0.002 U	0.0019 U	0.0019 U
PCB-1260	0.03	**15**	0.3 U	0.29 U	0.29 U
All other pesticides/PCBs were not detected above laboratory detection limits					
SVOCs					
Acenaphthene	37	1 U	3 J	1 J	1 U
Dibenzofuran	2	1 U	2 J	1 U	1 U
Fluoranthene	150	1 U	1 J	1 U	1 U
Fluorene	24	1 U	3 J	1 U	1 U
Naphthalene	20	1 U	4 J	1 U	1 U
Phenanthrene	120	1 U	3 J	1 U	1 U
All other SVOCs were not detected above laboratory detection limits					
VOCS					
2-Butanone	nca	3 U	3 U	3 U	3 J
Benzene	5	0.5 U	0.5 J	0.5 U	0.5 U
Xylene (Total)	1,200	0.8 U	0.8 J	0.8 U	0.8 U
All other VOCs were not detected above laboratory detection limits					

Bold - Concentration exceeds URS

nca- No criteria available

U - Compound was not detected above laboratory detection limits

J - Concentration is estimated